

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

UNITED STATES OF AMERICA,)	
Plaintiff,)	
)	
v.)	20 CR 445
)	Honorable Young B. Kim
)	
DEANGELO JONES,)	
Defendant.)	

**DEFENDANT’S UNOPPOSED MOTION TO MODIFY CONDITIONS OF
RELEASE**

NOW COMES, Defendant DEANGELO JONES, by and through his attorney, QUINN A. MICHAELIS, and respectfully requests this Court to order that the defendant’s conditions of pre-trial release be modified to allow Mr. Jones to attend an annual family fishing trip. In support of this motion, Mr. Jones states as follows;

1. Mr. Jones was released on a \$10,000 unsecured bond by this Court on August 7, 2020 to the custody of his wife, Latoya Jones. He was placed on home detention with electronic monitoring in Tulsa, Oklahoma, and was restricted from travel, but for the purposes allowed under home detention, and to travel to court in the Northern District of Illinois.
2. Mr. Jones would like to attend his family’s annual fishing trip that occurs every year before the beginning of the school year. Mr. Jones’ wife, Latoya Jones, and his two step children would all accompany him on this trip. His wife’s two sisters and his nephew would also be present for the entirety of the trip. The cabin the family has rented is located at 12301 Cross Timber Drive, Sperry, OK, which is approximately one half hour’s drive from Mr.

Jones' home address. If he were granted permission to attend this trip with his family, he would leave at 9:00 am on August 15, 2020, and return the following day at August 16, 2020 by 3:00 pm.

3. Both pretrial services and the government have been contacted regarding this motion. The government objects to modifying conditions of Mr. Jones' release to attend this trip. Mr. Jones' pretrial officer in Oklahoma indicates that they take no position with respect to this request.

WHEREFORE, DEANGELO JONES, by and through his attorney, QUINN A. MICHAELIS, respectfully requests this Court to order that the defendant's conditions of pretrial release be modified to allow him to attend his family's annual fishing trip.

Respectfully Submitted,

s/ Quinn A. Michaelis
Quinn A. Michaelis
Attorney for Deangelo Jones
73 W. Monroe, Suite 106
Chicago, IL 60601
312-714-6920

CERTIFICATE OF SERVICE

I hereby certify that on August 11, 2020, I electronically filed the above

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with the Clerk of Court using the CM/ECF system to all listed parties in the case.

Respectfully Submitted on August 11, 2020.

By His Attorney,

s/ Quinn A. Michaelis

Quinn A. Michaelis
Attorney For Deangelo Jones
73 W. Monroe, Suite 106
Chicago, Illinois 60601
312-714-6920